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FEB 18 2020	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPUTY

1 Parnell Colvin  
2 6681 Tara Ave  
3 Las Vegas, Nevada 89146  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

10 Parnell Colvin, )  
11 Plaintiff, )  
12 VS, )  
13 AHP Reality LLC, & )  
14 Qingwen Kong )  
15 \_\_\_\_\_)

**2:20-cv-00343-GMN-NJK**

COMPLAINT

Jurisdiction

The case originated from Las Vegas Justice Court. This court has jurisdiction under the right to Due Process under the Fifth Amendment that says to the federal government that no one shall be "deprived of life, liberty or property without due process of the law." The Fourteenth Amendment, ratified in 1868, uses the same eleven words , called the Due Process Clause, to describe a legal obligation of all states.

Plaintiff Parnell Colvin, was served seven day notice to pay rent or quit. On 2/3/2020 the notice was served prematurely because plaintiff has a three day grace period to pay rent which at time it was served plaintiff rent was not late. In addition the notice also included late fees which the defendants are not entitled to.

1 The new tenant laws require that the landlord hire a licensed process server , constable or  
2 sheriff to serve notices.This requirement of the law was not followed by the landlord  
3 futhermore the section of the notice ( DECLARATION OF SERVICE ). Must be filled in by the  
4 licensed professional to show proof and compliance of the law because these requirements were  
5 not followed by the landlord it makes the notice void and non enforceable. Please see exhibit #1.  
6

7 With all the laws being broken by the landlord and having prior dealings with justice court hearing  
8 master ( David Brown). He has disregarded the law on numerous occasions I recieived a notice  
9 I filled a timely answer I was waiting for a court date instead I recieived a 24 hour eviction notice.  
10 That was signed off by hearing master (David Brown) that the constable was coming the next day to  
11 evict me and my family. I recieived a panic call from my teenage daughter that we were going to be  
12 evicted the next day. I immedaiately had to leave work rush to justice court I had to argue with them  
13 that my due process rights were being violated and I have a right to have a hearing when I filled  
14 my answer in a timely manner.  
15

16 Justice court staff imformed me that hearing master David Brown, incorrectly signed the eviction  
17 order and he was going cancel and recall the eviction order he signed. After getting a copy of the  
18 landlord complaint I realize that the landlord had forged a person name on my lease and her  
19 personal imformation, forged the dates on my lease by changing them and submitting the  
20 fraudulent documents in court and hearing master David Brown, showed no concern.  
21 Again violating my due process rights.  
22

23 On october 21,2019 we were having another flood at the property so I contacted the landlord  
24 Vivian Mao, for assitance via texts she replied " dont contact me I dont manage this property  
25 anymore". I was suprised to recieve a notice from her. knowing that she has forged doucuments  
26 in the past. I wanted to get confirmation that she was now managing the property again after  
27 she told me she no longer manages the property.  
28

1 Feeling this could be a scam I tried contacting Vivian Mao, several ways and she or her office never  
2 responded. Via texts, voicemail, office number and via mail I never got a response. I would like to  
3 inform the court that in my answer in justice court I misstakingly refered to hearing master  
4 David Brown, as Mike Brown.

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6

7 DEMAND

8 Plaintiff Parnell Colvin, is requesting that this court dismiss the action that was brought against him  
9 in justice court ,due to his federal constitution rights being violated and laws being knowingly broken  
10 by the defendants in this case which violates Due Process of law.

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20 Dated February 18,2020

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Parnell Colvin  
6681 Tara Ave  
Las Vegas, Nv 89146  
(503) 490-6564

**SEVEN-DAY NOTICE TO PAY RENT OR QUIT**

(NRS 40.253)

Exhibit(1)

TO:

Parnell Colvin And ALL Occupants

AHP Realty, LLC

FROM: Business Name

Vivian Mao/Jun Fang Chen

Agent(s) Name(s)

6292 W. Spring Mountain Rd.

Address

Las Vegas, NV 89146

City, State, Zip Code

(702) 302-1530

Telephone Number Owner: Qingwen Kong

**DATE OF SERVICE: 02/03/2020**

**PLEASE TAKE NOTICE** that you are in default in payment of rent for the above-described premises for the period (insert beginning date covered by rent due) 02/01/2020 to (insert ending date covered by rent due) 02/29/2020. You are in default in the amount of:

Rent: (the periodic rent times the number of periods in default) \$2,600.00Late fees: (cannot be in excess of 5% of the periodic rent) \$130.00Total owed: (add above two lines—the rent owed plus late fees owed) \$2,730.00

Your failure to pay rent or vacate the premises before the close of business on the seventh (7th) judicial day<sup>1</sup> following the Date of Service of this notice may result in your landlord applying to the Justice Court for an eviction order. If the court determines that you are guilty of an unlawful detainer, the court may issue a summary order for your removal or an order providing for your nonadmittance, directing the sheriff or constable to post the order in a conspicuous place on the premises not later than 24 hours after the order is received by the sheriff or constable. The sheriff or constable shall then remove you not earlier than 24 hours but not later than 36 hours after the posting of the order. Pursuant to NRS 118A.390, you may seek relief if a landlord unlawfully removes you from the premises, or excludes you by blocking or attempting to block your entry upon the premises, or willfully interrupts or causes or permits the interruption of an essential service required by the rental agreement or chapter 118A of the Nevada Revised Statutes.

**YOU ARE HEREBY ADVISED OF YOUR RIGHT TO CONTEST THIS NOTICE** by filing an Affidavit no later than by the close of business<sup>2</sup> on the seventh (7th) judicial day following the Date of Service of this notice, with the Justice Court for the city of (insert name of city where property is located) Las Vegas, stating that you have tendered payment or are not in default of rent. The Justice Court is located at (insert Justice Court's address):

200 Lewis Ave.KN591Las Vegas, NV 89101

**YOU CAN OBTAIN AN AFFIDAVIT FORM AND INFORMATION** at the Civil Law Self-Help Center, located at the Regional Justice Center, downtown Las Vegas, or on its website, [www.CivilLawSelfHelpCenter.org](http://www.CivilLawSelfHelpCenter.org).

**DECLARATION OF SERVICE**

On (insert date of service) February 03, 2020, I served this notice in the following manner (check only one):

- By delivering a copy to the tenant(s) personally.
- Because the tenant(s) was absent from tenant's place of residence, by leaving a copy with (insert name or physical description of person served) \_\_\_\_\_, a person of suitable age and discretion, AND mailing a copy to the tenant(s) at tenant's place of residence.
- Because neither tenant nor a person of suitable age or discretion could be found there, by posting a copy in a conspicuous place on the property, AND mailing a copy to the tenant(s) at the place where the property is situated.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

February 03, 2020

(Date)

(Server's Name)

(Server's Badge/License #)<sup>3</sup>

(Server's Signature)

<sup>1</sup> Judicial days do not include the date of service, weekends, or certain legal holidays.

<sup>2</sup> The close of business varies between the courthouses, so make sure to check the business days and hours for the Justice Court listed above.

<sup>3</sup> A server who does not have a badge or license number may be an agent of an attorney licensed in Nevada. Notices served by agents must also include an attorney declaration as proof of service.